UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE	:	CHAPTER	13
IN RE	:	CHAPIER	I.

SATINA SHEED, :

BR No. 17-17464-MDC

Debtor. :

ORDER

AND NOW, this day of , 2022, upon consideration of the

Motion of the Chapter 13 Standing Trustee and the Debtor's Response thereto, and after notice and hearing, the Motion of the Standing Trustee is hereby DENIED.

HON. MAGDELINE D. COLEMAN U.S. Bankruptcy Judge

Interested Counsel and/or Parties:

Kenneth E. West, Esquire Chapter 13 Standing Trustee 1234 Market Street, Suite 1813 Philadelphia, PA 19107

Jonathan Sgro, Esq. Counsel for Debtor Community Legal Services, Inc. 1410 W. Erie Avenue Philadelphia, PA 19140

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE : CHAPTER 13

SATINA SHEED, :

BR No. 17-17464-MDC

Debtor.

<u>DEBTOR'S RESPONSE TO THE</u> STANDING TRUSTEE'S MOTION TO DISMISS

The Debtor, Satina Sheed, through counsel, responds to the Chapter 13 Standing Trustee's Motion to Dismiss as follows:

- 1. The Motion asserts that Debtor is not making payments.
- 2. As of the date of this Response, Debtor's plan payment arrears is \$1,275.
- 3. As of the date of this Response, Debtor had paid electronically to the Trustee her plan payment for June 2022 of \$620, which has not yet been credited to her account.
- 4. As of the date of this Response, the total amount remaining on Debtor's plan is \$3,755.
- 5. Debtor intends to pay an additional \$620 to the Trustee on or before July 21, 2022.
- 6. After this payment is credited, Debtor will only have five more payments to complete her plan.

WHEREFORE, the Debtor requests that this Court deny the Standing Trustee's Motion to Dismiss.

Respectfully submitted,

Date: June 28, 2022 s/ Jonathan Sgro

JONATHAN SGRO, ESQ. Attorney for Debtor Community Legal Services, Inc. 1410 W. Erie Avenue Philadelphia, PA 19140 Tel: (215) 227-4376

Fax: (215) 227-2435 jsgro@clsphila.org

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE : CHAPTER 13

SATINA SHEED, :

BR No. 17-17464-MDC

Debtor. :

CERTIFICATE OF SERVICE

I, Jonathan Sgro, Esquire, hereby certify that I served a copy of the foregoing Response to the Standing Trustee's Motion to Dismiss by electronic filing and by first class U.S. mail postage prepaid on the date below, upon the following parties:

Kenneth E. West, Esquire Chapter 13 Standing Trustee 1234 Market Street, Suite 1813 Philadelphia, PA 19107

Respectfully submitted,

Date: June 28, 2022 s/ Jonathan Sgro

JONATHAN SGRO, ESQ.

Attorney for Debtor

Community Legal Services, Inc.

1410 W. Erie Avenue Philadelphia, PA 19140

Tel: (215) 227-4376 Fax: (215) 227-2435 jsgro@clsphila.org